

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

2014 JUL -1 A 11: 27  
CLERK OF DISTRICT COURT  
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA, ex rel.,  
MICHAEL ANGEL,

Plaintiff,

v.

FRANCONIA REAL ESTATE SERVICES,  
INC. d/b/a RE/MAX ALLEGIANCE  
RELOCATION SERVICES,

Defendant.

Civil No.: 1:12 Civ. 764 (JCC) (TCB)

FILED EX PARTE AND UNDER SEAL  
PURSUANT TO 31 U.S.C. § 3730(b)

**JOINT STIPULATION OF DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(a), the United States, having intervened in part of this *qui tam* action brought pursuant to the False Claims Act, 31 U.S.C. §§ 3729-3733 (FCA), and Relator Michael Angel ("Relator"), hereby notify the Court of the voluntary dismissal of this action as set forth below.

In accordance with, and subject to the terms of, a settlement agreement ("the Settlement Agreement") reached between the United States, Relator, and defendant Franconia Real Estate Services, Inc., d/b/a RE/MAX Allegiance Relocation Services ("Defendant"), the United States is voluntarily dismissing, with prejudice, the claims asserted by Relator in this action on behalf of the United States and against Defendant for the Covered Conduct as defined in Paragraph C of the Settlement Agreement. Relator consents to the dismissal with prejudice of those claims.

In addition, Relator is voluntarily dismissing, with prejudice to Relator and without prejudice to the United States, the remaining claims asserted by Relator against Defendant in this action, including claims made in Relator's individual capacity, as well as those claims asserted on behalf of the United States in which claims the United States has declined to intervene.

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby consents to Relator's voluntary dismissal of that portion of the action, provided such dismissal is without prejudice to the United States.

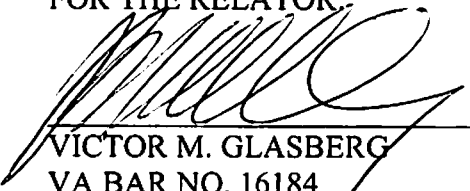
The Defendant has not filed an answer or responsive pleading to the Complaint.

A proposed Order accompanies this Joint Stipulation of Dismissal.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

AGREED TO:

FOR THE RELATOR:

  
VICTOR M. GLASBERG

VA BAR NO. 16184

VICTOR M. GLASBERG & ASSOCIATES

Counsel for Relator Michael Angel

121 South Columbus Street

Alexandria, VA 22314

Tel: (703) 684-1100

Fax: (703) 684-1104

Email: vmg@robinhoodesq.com

TERESA N. CAVENAUGH

DUANE MORRIS LLP

Counsel for Relator Michael Angel

30 South 17<sup>th</sup> Street

Philadelphia, PA 19103

Tel: (215) 979-1808

Email: tncavenagh@duanemorris.com

Dated: June 30, 2014

AGREED TO:

FOR THE UNITED STATES:

STUART F. DELERY

Assistant Attorney General

Civil Division

DANA J. BOENTE

United States Attorney

Eastern District of Virginia

  
MICHAEL D. GRANSTON

JUDITH RABINOWITZ

ANDREW A. STEINBERG

Commercial Litigation Branch, Civil Division

U.S. Department of Justice

Counsel for the United States

Post Office Box 261

Washington, D.C. 20044

Telephone: (202) 616-1437

Fax: (202) 307-3852

e-mail: [Andrew.Steinberg@usdoj.gov](mailto:Andrew.Steinberg@usdoj.gov)

PETER S. HYUN

Assistant U.S. Attorney

Counsel for the United States

2100 Jamieson Ave.

Alexandria, VA 22314

Tel: (703) 299-3737

Fax: (703) 299-3983

e-mail: [peter.hyun@usdoj.gov](mailto:peter.hyun@usdoj.gov)

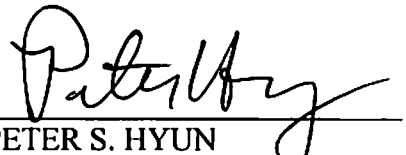
**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of July, 2014, a true and correct copy of the **JOINT STIPULATION OF DISMISSAL** and a proposed Order were mailed by first-class mail to:

Victor M. Glasberg  
Bernadette Armand  
Victor M. Glasberg & Associates  
121 South Columbus Street  
Alexandria, VA 22314

Teresa N. Cavenagh  
Duane Morris LLP  
30 South 17<sup>th</sup> Street  
Philadelphia, PA 19103.

*Counsel for Relator Michael Angel*

  
PETER S. HYUN  
Assistant United States Attorney